

IN THE UNITED STATES DISTRICT COURT OF SOUTHERN MISSISSIPPI
SOUTHERN DIVISION

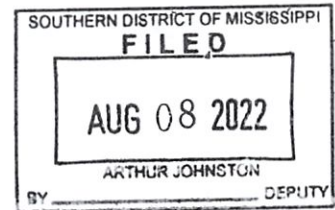
FATHER JESUS

Plaintiff

1:22-CV-00204-HSO-BWR

v.

GRAY MEDIA GROUP, INC., F/K/A Raycom
Media, Inc, Successor by Merger to
WLOX, LLC.
Defendant



AMMENDED COMPLAINT and Request for injunction to trade as equal
citizen/religious based production as others that Defendant trades with or equal
production Defendant offer themselves.

NOW COMES Father Jesus, the Plaintiff *pro se* and brings this action against GRAY
MEDIA GROUP, INC, and for reasons state as follows:

THE PARTIES

- Plaintiff, King Jesus, is an African American male and resident of Harrison County, Mississippi.
- Defendant, GRAY MEDIA GROUP, INC referred to as WLOX, is a Mississippi based company with its principal place of business in Biloxi, Harrison County, Mississippi.

NATURE OF THE CASE

- On 6/10/2021 Plaintiff requested to purchase advertisement for Himself and 3 other Performers who made reference to Plaintiff's brand. Plaintiff was met with discriminatory behavior which restricted trade for His religious brand and the 3 performers brands who's performance helped His. Plaintiff's brand suffers significant financial impairment as a result. The 3 Performers who's performance helped Plaintiff suffered significant financial impairment also as a result.

- WLOX is a television broadcasting company that makes millions of dollars a year by dominating the local online and television landscape with display ads and commercials.

- WLOX's advertising monopoly is extensive as every consumer goods company, e-commerce entity, and small business who advertise in the state of Mississippi must depend on WLOX as their respective agent to market their goods and services to consumers.

- WLOX uses its monopoly to reinforce anticompetitive acts and thus dictate the rules by which advertising in Mississippi is bought and sold.

- WLOX's anticompetitive and deceitful conduct undermines consumer choices, increases prices, harms innovation and denies Plaintiff and other religious content creators, advertising opportunities.

- Plaintiff is a licensed minister and founder of "The Saints of The Most High" religious group. Plaintiff is a distinguished member of his community and his businesses have served the community for years.

- In 2015 and 2016, WLOX accepted and published Plaintiff's advertising which included a religious online television show. However, after 2016, after multiple requests, WLOX refused to advertise the Plaintiff's religious based content.

- Between 2016 to the present day, Plaintiff has been the victim of intentional race and religious discrimination, which has had and continues to have a destructive effect on his business and livelihood, all in violation of his rights under the U.S. Constitution and Mississippi law.

- Since 2016, WLOX has intentionally discriminated against the Plaintiff, refusing his advertising business on all its platforms.

- Although WLOX continues to contract with white-owned and otherwise controversial content producers who advertise such shows as "Getting Played" and "Saints and Sinners," WLOX refuses to allow the Plaintiff to advertise his religion and his cause on its platform.

- In so doing, WLOX has caused the Plaintiff serious damage which cannot be justified. There is no lawful justification for the economic and other damage that WLOX has inflicted.

- Defendant has presented Plaintiff on His News Platforms encouching adverse news several times but refuse Plaintiff the opportunity to purchase any positive promotion of His brand on the same platform. On 6/10/2021 Defendant has refused 3 other independant Brands because They supported Plaintiffs Religious Brand.

- In an effort to insure compliance with Defendants own views and save Plaintiffs brand, Plaintiff requested on:

Dana Givens WLOX Sales Manager 5/21/21 14:33 2:46 min

Michael WLOX 5/25/21 09:34 1:35 min

Michael WLOX 5/25/21 09:39 0:51 min

for Defendant to Produce advertisement themselves for Plaintiff that they may insure theyre own personal standards are met. Defendant refused the production services He offers openly to the public..

- By this lawsuit, Plaintiff seeks to vindicate the violation of his rights protected by the U.S. Constitution and Mississippi law and seeks redress for the damage that WLOX has caused.

Count I – Violation of Mississippi’s Consumer Protection Act (MCPA)

- Plaintiff alleges and incorporates the allegations made throughout this Complaint.

- Miss. Code Ann. § 75-24-5(1) does not define “unfair” or “deceptive.” Instead, the Mississippi statute provides a non-exhaustive list of prohibited unfair methods of competition and unfair or deceptive trade practices or acts including (h) disparaging the goods, services, or business of another by false or misleading representation of fact.

- WLOX refused to allow the Plaintiff to advertise his religious services on its platform although he had done so in the past and further disparaged his religious business.

Count II – Violation of Mississippi’s Antitrust Act (MAA)

- Plaintiff alleges and incorporates the allegations made throughout this Complaint.

- Miss. Code Ann. § 75-21-1 defines a trust or combine as a combination, contract, understanding or agreement, expressed or implied, between two or more persons, corporations or firms or association of persons or between anyone or more of either with one or more of the others, when inimical to public welfare and the effect of which would be: (a) To restrain trade;

GREY TELEVISION INC conspired with its subsidiaries to prevent the Plaintiff from advertising his services and made it impossible to trade within Mississippi by banning Him from Defendants Monopoly of 180 stations across 113 markets abroad and in the 50 States Of United States which encompass NBC, CBS,ABC,FOX BOUNCE and Most Mainstream brands. Continued promotion was vital for Plaintiffs Growth and Development after Plaintiffs religious brand began to make international headlines gaining attention of White House Personnel.

By Defendant allowing the Plaintiffs religion to gain the market through promotion, and immediately at His breaking point disallow consistency would alone have destroyed even brands like Nike or Coca Cola, But after banning Plaintiff, Defendant promoted through its News Source Plaintiff as a fallen, disliked religious brand. Defendant promoted opinions offered by rival religions crashing a community meeting for adjacent neighbors of Plaintiff. “NO” adjacent community members who were requested to attend (it they oppose consent or didn’t approve of Plaintiffs Religious Freedom) attended the meeting, rather the real community members approved and gave their consent directly to Plaintiff. Plaintiff asked Defendant for the opportunity to return and reach His fanbase since obviously Defendant found it to be a Hit mainstream Head Line running it several times on ABC, CBS and all it’s major Channels. Defendant, continued the lockout from 2016-Pres disallowing Plaintiff to gain equal momentum of His brand thus destroying His brand and leaving the last memory being: Plaintiffs religion alike a Politician or Coca Cola (had it not prevailed to promote it’s own media equally) is disliked, Pepsi and Puma should be the choice of the NBA.

Prayer for Relief

WHEREFORE, Plaintiff requests that this Honorable Court enter judgement in his favor on each county in this Complaint an injunction to trade as equal citizen/religious based production as others that Defendant trades with or equal production Defendant offer themselves. Also that You may enter an Order awarding the Plaintiff the amount of \$10,500,000.00 and an award of costs and expenses of all litigation; and further relief to which Plaintiff is entitled or that this Honorable Court deems just and proper.

Date: 8-8-22

Father Jesus

Father Jesus
3106 11th Street

Gulfport, MS 39501

CERTIFICATE OF SERVICE

On this ____ day of August 2022, I hereby certify that I served a copy of the Amended Complaint was served via U.S. Mail, postage prepaid to

Ryan J. Richmond
STERNBERG, NACCARI & WHITE, LLC
251 Florida Street
Suite 203
Baton Rouge, LA 70801-1703

Date: 8-8-22

Father Jesus

Father Jesus